

The Honorable James L. Robart
Trial Date: March 9, 2020

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NAXOS, LLC, d/b/a Spiros Greek
Restaurant,

Plaintiff,

vs.

AMERICAN FAMILY INSURANCE
COMPANY, a foreign insurer,

Defendant.

Case No. 18-CV-01287 JLR

**STIPULATED MOTION FOR RELIEF
FROM DISCOVERY DEADLINE**

NOTED ON MOTION CALENDAR:
NOVEMBER 7, 2019

Pursuant to LCR 7(j) and 10(g), the parties hereby stipulate and jointly request that this Court continue the deadline to complete discovery by six (6) more days from November 19, 2019 to November 25, 2019, for the purposes of completing two (2) additional depositions.

Counsel for the parties have conferred and have undertaken substantial efforts to schedule all depositions prior to the discovery deadline. The parties agreed that relief from the discovery deadline for completion of these two additional depositions is warranted.

The parties propose scheduling depositions as follows:

November 20, 2019; Trina Loukas, Naxos Fed. R. Civ. P. 30(b)(6) corporate designee.

November 25, 2019; John Loukas, fact witness.

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**STIPULATED MOTION FOR RELIEF FROM
DISCOVERY DEADLINE - 1**

COLE | WATHEN | LEID | HALL, P.C.
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SEATTLE, WASHINGTON 98109-6243
(206) 622-0494/FAX (206) 587-2476

1 IT SO STIPULATED

2 DATED this 7th day of November, 2019.

3 **COLE | WATHEN | LEID | HALL, P.C.**

4 s/ Jeremy L. Muth

5 Rory W. Leid, III, WSBA #25075

6 Jeremy L. Muth, WSBA #52055

7 *Attorneys for Defendant*

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11 rleid@cwllhlaw.com | jmuth@cwllhlaw.com

12 DATED this 7th day of November, 2019.

13 **LEATHER & ASSOCIATES, PLLC**

14 s/ Eric Neal with email permission

15 Thomas Lether, WSBA #18089

16 Eric Neal, WSBA #31863

17 1848 Westlake Avenue N., Suite 100

18 Seattle, WA 98109

19 Tel: 206-467-5444

20 tlether@letherlaw.com | eneal@lether.law.com

21 DATED this 7th day of November, 2019.

22 **KELLER ROHRBACK L.L.P.**

23 s/ Jeff N. Comstock with email permission

William C. Smart, WSBA #8192

Ian S. Birk, WSBA #31431

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ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS HERBY ORDERED:

1. The parties; Stipulated Motion for Relief from discovery Deadline is HEREBY GRANTED.
2. The parties may conduct depositions as proposed above.
3. All other deadlines remain in place.

DATED this 8th day of November, 2019.



JAMES L. ROBART
United States District Judge

CERTIFICATE OF SERVICE

The undersigned makes the following declaration certified to be true under penalty of perjury pursuant to RCW 9A.72.085:

On the date given below, I hereby certify that I caused the foregoing to be filed using the United States District Court for Western District of Washington – Document Filing System (CM/ECF) which will also send notification to the following:

<u>Counsel for Plaintiff:</u> Eric Neal, WSBA #31863 Chance Laboda, WSBA #54273 Jenna Mark, WSBA #54366 Thomas Oster, WSBA #52880 LEATHER & ASSOCIATES, PLLC 1848 Westlake Avenue N., Suite 100 Seattle, WA 98109 206-467-5444 eneal@letherlaw.com claboda@letherlaw.com jmark@letherlaw.com toster@letherlaw.com ateretchenko@letherlaw.com	<u>Via Email/E-Service</u>
<u>Co-Counsel Plaintiff:</u> William C. Smart, WSBA #8192 Ian S. Birk, WSBA #31431 Nathan L. Nanfelt, WSBA #45273 1201 Third Avenue, Ste. 3200 Seattle, WA 98101 206-623-1900 wsmart@kellerrohrback.com ibirk@kellerrohrback.com nnanfelt@kellerrohrback.com	<u>Via Email/E-Service</u>

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 7th day of November, 2019, at Seattle, Washington.

s/ Jodi Graham
Jodi Graham, Legal Assistant
jgraham@cwllhlaw.com

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Case No. 18-CV-01287 JLR
**STIPULATED MOTION FOR RELIEF FROM
DISCOVERY DEADLINE - 5**

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